

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE QUDIAN INC. SECURITIES
LITIGATION

Master File No.: 1:17-CV-09741-JMF

**NOTICE OF MOTION AND UNOPPOSED MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that, pursuant to the Court Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 228), on April 27, 2021 at 4:00 p.m., before the Honorable Jesse M. Furman, in Courtroom 1105 of the Thurgood Marshall United States Courthouse, Southern District of New York, 40 Foley Square, New York, NY 10007, lead plaintiffs Alan B. Hertz and the Alan Hertz Family 2012 Trust (collectively, “Lead Plaintiffs”), and additional named plaintiff Darwin Sutanto (together with Lead Plaintiffs, the “Plaintiffs”)¹ will and hereby do move the Court to: (1) grant final approval of the Settlement in the above-captioned Action on the terms set forth in the Stipulation; and (2) approve the proposed Plan of Allocation for distribution of the Net Settlement Fund.

This motion is based on this Notice of Motion; the memorandum of law in support thereof; the Declaration of Jonathan M. Rotter and Jack I. Zwick in Support of: (I) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

Dated: March 23, 2021

By: /s/ Jonathan M. Rotter
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¹ Capitalized terms that are not otherwise defined herein have the same meanings given to them in the Stipulation and Agreement of Settlement, dated November 13, 2020 (the “Stipulation,” ECF No. 227-1).

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Lead Counsel for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the Clerk of Court via the CM/ECF system, which will send Notice of such filing to all counsel of record.

Dated: March 23, 2021

s/ Jonathan M. Rotter
Jonathan M. Rotter